

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

OLEKSIY SHARAPKA

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CRIMINAL NO. 05-10004-PBS

**AFFIDAVIT IN SUPPORT OF SUPPLEMENTAL MEMORANDUM**  
**RELATED TO MOTION TO DISMISS SUPERCEDING INDICTMENT**

I, Oleksiy Sharapka, ("Sharapka"), depose and state the following:

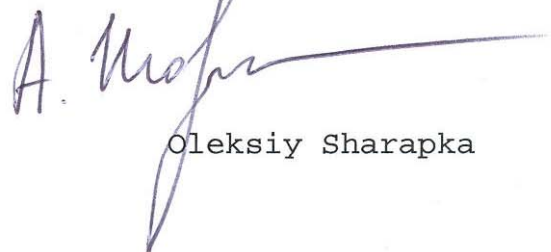
1. I am the Defendant in the above-captioned matter.
2. The notes of the agents with regard to the information provided during my proffer sessions are incomplete in that a large amount of information provided is not mentioned.
3. I do not have any specific notes of my own or taken by my counsel which document in detail the information provided by me at the proffers.
4. The Government has not provided information available or used to obtain the original indictment thus making it difficult to potentially compare what information was actually uncovered prior to my proffers.
5. My proffer sessions were lengthy and the information I provided as to the scheme and its methods of operation was detailed. During one of my last proffer sessions we spent several hours going through electronic files on my laptop computer

containing account information as well as print outs of other information on the computer. I explained to the government where and what this information was, how it could be identified and used or problems in its use. We addressed the white cards and other electronic files containing large amounts of potential account numbers. I explained how I tried to crack only a portion of these potential accounts and passwords through a complicated program and process with only limited success.

6. I provided the electronic location of information relating to the names Alexis Llanos and Andrew Schwankoff, specifically, where their social security numbers and addresses were located. I also provided information as to how and when I came into possession of these identities.

6. This affidavit does not detail all the information provided in my proffers. I provided details as to the location of information related to numbers that were potential accounts, including "Sears" cards, mail drop locations other than mail boxes etc. used by myself and others, and account information belonging to others. None of this would have been clear or available to the government but for my sharing it in my proffers.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 11<sup>th</sup> DAY OF January, 2006.



Oleksiy Sharapka